

FILED

JUN 23 2022 

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

THOMAS PAVEY,
also known as “dopenugget,” and
RAHEIM HAMILTON,
also known as “ZeroAngel”

Case No.

Violations: Title 18, United States Code,
Sections 371 and 473

UNDER SEAL

The SPECIAL JULY 2021 GRAND JURY charges:

1. At times material to this indictment,

a. AlphaBay was an online marketplace operating on what is often referred to as the dark web, which is available via the Internet to users with certain software. AlphaBay provided an online platform for illegal goods and services to be offered for sale and exchanged, and allowed buyers and sellers of these goods and services to conceal their true identities. To buy or sell goods or services on AlphaBay, users were required to establish accounts with unique usernames. AlphaBay allowed customers and vendors to communicate electronically via direct messages and forum postings. To sell goods or services on AlphaBay, a user had to pay a vendor bond. A vendor bond is a one-time payment that an AlphaBay user paid in order to set up a vendor account.

b. THOMAS PAVEY used the username “dopenugget” on AlphaBay.

1:22-cr-323
Judge Steven C. Seeger
Magistrate Judge Gabriel A. Fuentes
RANDOM

c. RAHEIM HAMILTON used the username and “ZeroAngel” on AlphaBay.

d. Customer 1, Customer 2, and Customer 3 were customers on AlphaBay. Customer 2 resided in the Northern District of Illinois.

e. In order to sell or buy items on AlphaBay, users needed to use virtual currency, such as bitcoin, in order to make payments to AlphaBay or other users. Virtual currencies are electronically-sourced units of value that exist on the Internet and are not typically stored in a physical form. Virtual currencies are not issued by a government but are generated and controlled through computer software operating on decentralized peer-to-peer networks.

f. THOMAS PAVEY maintained a bank account at Bank 1, which he used to purchase virtual currency using his account on Cryptocurrency Exchange Platform 1.

g. RAHEIM HAMILTON maintained an account on Cryptocurrency Exchange Platform 2, which he used to purchase virtual currency.

2. Beginning on or about June 15, 2016 to on or about July 5, 2017, in the Northern District of Illinois and elsewhere,

THOMAS PAVEY,
also known as “dopenugget,” and
RAHEIM HAMILTON,
also known as “ZeroAngel,”

defendants herein, knowingly conspired with each other and with others known and unknown to the Grand Jury, to sell, transfer, and deliver false, forged, counterfeited and altered obligations and securities of the United States, with the intent that the

same be passed, published, and used as true and genuine, in violation of Title 18, United States Code, Section 473.

3. It was part of the conspiracy that PAVEY and HAMILTON opened and operated vendor accounts on AlphaBay.

4. It was part of the conspiracy that PAVEY used the username "dopenugget" on AlphaBay.

5. It was part of the conspiracy RAHEIM HAMILTON used the username and "ZeroAngel" on AlphaBay.

6. It was further part of the conspiracy that PAVEY and HAMILTON used AlphaBay accounts to advertise and sell counterfeit, false, forged and altered U.S. currency.

7. It was further part of the conspiracy that PAVEY and HAMILTON represented on AlphaBay that PAVEY created counterfeit currency, and that HAMILTON was PAVEY's authorized retailer.

8. It was further part of the conspiracy that PAVEY and HAMILTON communicated to potential customers on AlphaBay the methods PAVEY used to create counterfeit currency, including the tools and materials PAVEY used.

9. It was further part of the conspiracy that PAVEY and HAMILTON communicated to potential customers on AlphaBay that the counterfeit currency had features designed to thwart counterfeit detection tools and make the counterfeit currency appear to be genuine currency.

10. It was further part of the conspiracy that PAVEY and HAMILTON communicated to their customers methods to modify counterfeit currency to make the counterfeit currency appear and feel more like genuine currency.

11. It was further part of the conspiracy that PAVEY and HAMILTON sold counterfeit U.S. currency for a fraction of the face value of the counterfeit currency.

12. It was further part of the conspiracy that PAVEY and HAMILTON sold or caused to be sold counterfeit currency to AlphaBay users, including Customer 1 and Customer 2.

13. It was further part of the conspiracy that PAVEY and HAMILTON shipped or caused to be shipped counterfeit currency to AlphaBay users, including Customer 1 and Customer 2.

14. It was further part of the conspiracy that PAVEY and HAMILTON concealed, misrepresented and hid and caused to be concealed, misrepresented, and hidden the existence and the purpose of the conspiracy and the acts done in furtherance of the conspiracy.

15. In furtherance of this conspiracy and to effect its objects and purposes, PAVEY and HAMILTON committed and caused to be committed the following overt acts, among others, within the Northern District of Illinois and elsewhere:

a. On or about June 15, 2016, HAMILTON paid a vendor bond on AlphaBay using virtual currency.

b. On or about June 15, 2016, HAMILTON created product listings on AlphaBay advertising counterfeit U.S. currency for sale.

c. On or about June 15, 2016, on HAMILTON's AlphaBay product listing, PAVEY and HAMILTON wrote or caused to be written, that "ZeroAngel" was an endorsed seller of "dopenugget's" counterfeit U.S. currency.

d. On or about June 18, 2016, HAMILTON sent or caused to be sent a message to another AlphaBay user stating HAMILTON was going to be "dopenugget's" retailer.

e. On or about June 18, 2016, HAMILTON posted or caused to be posted a message in a AlphaBay forum related to counterfeit currency vendors, stating that HAMILTON was the "official retailer" of "dopenugget's" counterfeit bills.

f. On or about June 18, 2016, HAMILTON posted a message in a AlphaBay forum related to counterfeit currency vendors, stating that HAMILTON's vendor site would "go live" that day.

g. On or about June 21, 2016, PAVEY posted a message on AlphaBay's forum indicating AlphaBay user "ZeroAngel" was selling PAVEY's counterfeit notes, that "ZeroAngel" was trustworthy, and that having "ZeroAngel" sell PAVEY's counterfeit currency and deal with customers would allow PAVEY to have more time to improve the quality of his counterfeit currency.

h. On or about July 24, 2016, HAMILTON sent or caused to be sent a message to another AlphaBay user stating "dopenugget" was working on improving the counterfeit currency and offered to send a sample to the AlphaBay user.

i. On or about September 4, 2016, HAMILTON posted or caused to be posted a message to an AlphaBay forum regarding “dopenugget’s” progress adding a certain feature to the counterfeit currency to avoid detection.

j. From on or about June 18, 2016 to on or about July 5, 2017, HAMILTON made over 2,700 sales of counterfeit currency on AlphaBay.

k. On or about June 29, 2016, HAMILTON received an order for counterfeit currency from Customer 1.

l. On or about July 7, 2016, HAMILTON received an order for counterfeit currency from Customer 1.

m. On or about July 15, 2016, HAMILTON received an order for counterfeit currency from Customer 1.

n. On or about July 27, 2016, HAMILTON received an order for counterfeit currency from Customer 1.

o. On or about August 4, 2016, HAMILTON received an order for counterfeit currency from Customer 1.

p. On or about October 9, 2016, HAMILTON received an order for counterfeit currency from Customer 1.

q. On or about January 13, 2017, HAMILTON received an order for counterfeit currency from Customer 1.

r. On or about May 15, 2017, HAMILTON received an order for counterfeit currency from Customer 1.

s. On or about June 14, 2017, HAMILTON accepted an order for counterfeit currency from Customer 2.

t. On or about June 14, 2017, HAMILTON instructed Customer 2 how Customer 2 should communicate shipping information for counterfeit currency Customer 2 had purchased.

u. On or about June 16, 2017, HAMILTON responded to inquiries from Customer 2 about Customer 2's counterfeit currency order.

v. Between on or about June 10, 2017 and July 4, 2017, HAMILTON exchanged messages with a potential customer, indicating HAMILTON would send the potential customer sample counterfeit in exchange for a detailed review.

w. On or about July 4, 2017, HAMILTON accepted an order of counterfeit currency from Customer 3.

x. HAMILTON maintained a vendor page offering counterfeit currency for sale on AlphaBay, until July 5, 2017.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

The SPECIAL JULY 2021 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 371 and 473, as set forth in this indictment, defendants THOMAS PAVEY and RAHEIM HAMILTON shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, including a personal money judgement, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

signed by Steven J. Dollear on behalf of the
UNITED STATES ATTORNEY